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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH EDWARD-GERALD DOTSON,

Defendant.

Case: 2:19-cr-20793
Judge: Drain, Gershwin A.
MJ: Patti, Anthony P.
Filed: 12-03-2019 At 03:26 PM
INDI USA V KEITH EDWARD-GERALD DOTSON (LG)

Vio: 18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252A(a)(5)(B)
Forfeiture Allegations

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. § 2252A(a)(2)
Distribution of Child Pornography

In or about December of 2018, in the Eastern District of Michigan, the defendant, KEITH EDWARD-GERALD DOTSON, did knowingly distribute child pornography as defined in 18 U.S.C. § 2256(8); and the images distributed by the defendant had been mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign commerce, and had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT TWO

18 U.S.C. § 2252A(a)(2)

Receipt of Child Pornography

From on or about January 12, 2018, to on or about December 9, 2018, in the Eastern District of Michigan, the defendant, KEITH EDWARD-GERALD DOTSON, did knowingly receive child pornography as defined in 18 U.S.C. § 2256(8); and the images received by the defendant had been mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign commerce, and had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT THREE

18 U.S.C. § 2252A(a)(5)(B)

Possession of Child Pornography

On or about July 9, 2019, within the Eastern District of Michigan, the defendant, KEITH EDWARD-GERALD DOTSON, knowingly possessed one or more computer hard drives, cell phones, CDs, DVDs, cameras, magazines, periodicals, and other material which contained child pornography, as defined in Title 18, United States Code, Section 2256(8), including but not limited to visual depictions of real minors, prepubescent minors and minors who had not attained twelve (12) years of age, engaged in sexually explicit conduct, that had been shipped

and transported using any means and facility of interstate and foreign commerce, had been shipped and/or transported in and affecting interstate and foreign commerce, and were produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATIONS

Upon conviction of the offense charged in Counts One through Three of the Indictment, the defendant, KEITH EDWARD-GERALD DOTSON, shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Such property includes, but is not limited to, the following items seized on July 9, 2019:

- APPLE IPHONE X, Serial Number: F2RVVXTCJCL6
- WESTERN DIGITAL CAVIAR BLUE HARD DRIVE, Serial Number: WCAV33453369
- WESTERN DIGITAL CAVIAR GREEN HARD DRIVE, Serial Number: WCAV50201760
- SEAGATE BARRACUDA 7200.7 HARD DRIVE, Serial Number: 4JS1JZHD
- WESTERN DIGITAL CAVIAR SE WD800JD HARD DRIVE, Serial Number: WMAM9SS01968
- WESTERN DIGITAL CAVIAR SE WD800JD HARD DRIVE, Serial Number:
WCANY2261177
- WESTERN DIGITAL SE 16 WD2500AAKS, Serial Number: WMART0478427
- HITACHI 5K750-500 HARD DRIVE, Serial Number: 51HMD0BE
- WESTERN DIGITAL SCORPIO BLUE WD6400BPVT H/D, Serial Number: WX81E71AXCY3
- WESTERN DIGITAL SCORPIO BLUE WD6400BPVT H/D, Serial Number: WXB1AC045834
- SEAGATE SRD00F1 HARD DRIVE, Serial Number: NA4T38QK
- SEAGATE SRD0SP0 HARD DRIVE, Serial Number: NA5CLJE1
- SEAGATE SRD00F1 HARD DRIVE, Serial Number: NA7KKGMS
- SEAGATE FREEAGENT HARD DRIVE, Serial Number: 2GET33AN
- LACIE LRD0TU1 HARD DRIVE WITH ORANGE CASE, Serial Number: 99991507020959QR
- SEAGATE FREEAGENT GOFLEX DESK H/D, Serial Number: NA0J7SSR
- SEAGATE BLACKARMOR WS110 H/D, Serial Number: 2HCJ1GH8
- 19 JPI USB THUMB DRIVES
- SILVER USB THUMB DRIVE
- LEXAR USB THUMB DRIVE
- UNKNOWN MAKE BLACK USB THUMB DRIVE
- ROSE GOLD APPLE IPHONE 5 WITH GLITTER CASE
- KODAK 1GB SD CARD

- HEWLETT PACKARD PAVILION, DVH-1245DX, Serial Number: CNF9254C94
- SEAGATE BLACKUP PLUS HUB HARD DRIVE, Serial Number: NA8TB1HA
- CENTON DATASTICK PRO USB THUMB DRIVE
- APPLE IPHONE, IMEI: 013442008351313
- WESTERN DIGITAL EASY STORE HARD DRIVE, Serial Number: WCC7K5KLKL7J
- WESTERN DIGITAL EASY STORE HARD DRIVE, Serial Number: WCC7K2HDP6TF
- BLACK POWERSPEC G428 DESKTOP
- LEXAR 8GB USB THUMB DRIVE
- SEAGATE, XBOX SRD0NF1 HARD DRIVE, Serial Number: NZ07KS46
- SEAGATE EXPANSION SRD0NF2 HARD DRIVE, Serial Number: NA8FZ5XS
- SANDISK EXTREME PLUS 32GB MICRO SD CARD WITH SANDISK SD CARD ADAPTER
- CANON VIXIA R42 VIDEO CAMERA, Serial Number: 642704502400
- SEAGATE BARRACUDA LP HARD DRIVE, Serial Number: 5XW00F85
- WESTERN DIGITAL 2D400 HARD DRIVE, Serial Number: WMAMC1966897
- HITACHI DK23FB-40 HARD DRIVE, Serial Number: 7BFH4A1AE058
- SEAGATE ST315323A HARD DRIVE, Serial Number: 5EH0220B
- WESTERN DIGITAL WD200 HARD DRIVE, Serial Number: WMA6Y3951867
- IBM DESKSTAR HARD DRIVE, Serial Number: SV0H7633
- APPLE IPAD PRO, IMEI: 355448070619046
- NIKON COOLPIX STARTER MEMORY CARD, Serial Number: P/N: 2221-016
- SANDISK, 128MC COMPACT FLASH CARD

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

s/ Matthew Roth
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Date: December 3, 2019

ORIGINAL

United States District Court
Eastern District of Michigan**Criminal Case Cover**Case: 2:19-cr-20793
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>Dej</i>

Case Title: USA v. Keith Edward-Gerald DOTSON**County where offense occurred :** Wayne**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 19-30587]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 3, 2019
Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.